

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DAVID J. PERRAS,

Plaintiff,

v.

THE COCA-COLA COMPANY OF
NORTH AMERICA,

Defendant.

Case No. 1:19-cv-01831-MHC

**DECLARATION OF DARREN SHULER IN SUPPORT
OF DEFENDANT THE COCA-COLA COMPANY'S
MOTION FOR SUMMARY JUDGMENT**

I, Darren Shuler, hereby declare as follows:

1. My name is Darren Shuler, I am over the age of 21 years, and I am competent to make this declaration, which is made in furtherance of Coca-Cola's Motion for Summary Judgment.

2. I am a Partner at the law firm of King & Spalding LLP, which is counsel of record in this matter for Coca-Cola. I am a member in good standing of the Bar of this Court. I have knowledge of and am familiar with the matters stated in this declaration based on my representation of Coca-Cola in this matter.

3. Attached as Exhibit 1 to this declaration is a true and correct copy of a Letter from Coca-Cola to David J. Perras dated July 29, 2016.

4. Attached as Exhibit 2 to this declaration is a true and correct copy of Letter from Coca-Cola to David J. Perras dated the October 18, 2012.

5. Attached as Exhibit 3 to this declaration is a true and correct copy of the Medical Benefits Summary Plan Description for U.S. Associations at The Coca-Cola Company, effective January 1, 2010.

6. Attached as Exhibit 4 to this declaration is a true and correct copy of a Letter from Coca-Cola to David J. Perras dated May 31, 2016.

By providing this information, neither Coca-Cola nor its counsel waives any privilege(s) that it or they may assert with respect to the attorney-client communications or attorney work product. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 22, 2020.

/s/ Darren A. Shuler

Darren A. Shuler